



U.S. Department of Justice

*United States Attorney
Northern District of Ohio*

United States Court House
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852

January 8, 2016

*Via USA File Exchange to
ecn@fanlegal.com*

Eric C. Nemecek, Esq.
Friedman & Nemecek, L.L.C.
The IMG Center
1360 E. 9th Street, Suite 650
Cleveland, Ohio 44114

Re: **United States of America v. John Clements**
Case No. 1:15-CR-00275 – Judge Dan Aaron Polster

Dear Mr. Nemecek:

Pursuant to your request and as a supplement to my previous discovery response and Rule 16 of the Federal Rules of Criminal Procedure, I have uploaded the following documents to the John Clements Discovery Folder on USA File Exchange relative to the above-captioned case:

1. Shareaza LE Summary Report; and
2. Shareaza LE Logs Folder (containing 52 files).

Should you or your expert have any questions about the above files, please feel free to contact me.

All evidence referred to in the enclosed reports as well as any other items seized from the defendant or to be offered by the government in its case-in-chief is available for your inspection at a mutually convenient time. Should you wish to view the child pornography evidence, please contact to me arrange it.

Please note that by disclosing evidence beyond our legal requirements, the government is not waiving its right to object to any request for additional disclosures.

Pursuant to Rule 16(b)(1)(A) and (B) of the Federal Rules of Criminal Procedure, please allow this letter to serve as a request for reciprocal discovery to inspect and copy any books, papers, documents, photographs, tangible objects, and results of physical or mental examinations or scientific tests or experiments, which are in the custody or control of the defendant, or with the exercise of due diligence can be obtained by the defendant, and which the defendant intends to introduce as evidence at his forthcoming trial.



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Page 2 of 2

The government also respectfully requests notice of any defense based on mental condition, insanity, duress or entrapment.

Should you have any questions, concerns, or would like to discuss this case further, please feel free to contact me.

Very truly yours,

STEVEN M. DETTELBACH
United States Attorney

By: s/ Brian M. McDonough
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Enclosures (via USA File Exchange)